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From: Rich Holland [mailto:rich@wonews.com]

Sent: Monday, February 28, 2005 2:28 PM

To: MLPAComments@resources.ca.gov

Subject: MLPAComments: peer review

Please pass this comment along to both the Blue Ribbon Task Force and the Science Team.

I would like to make sure the members of the task force and the science team are aware of the "Final Information Quality Bulletin for Peer Review" recently published by the Office of Management and Budget.

<http://www.whitehouse.gov/omb/inforeg/peer2004/peer>

While the document is a federal directive, there are many good points made that apply to the MLPA Initiative process.

Here are just a couple passages.

On page 12, the second paragraph under the heading Section II: Peer Review of Influential Scientific Information:

"The National Academy of Public Administration suggests that the intensity of peer review should be commensurate with the significance of the information being disseminated and the likely implications for policy decisions. Furthermore, agencies need to consider tradeoffs between depth of peer review and timeliness. More rigorous peer review is necessary for information that is based on novel methods or presents complex challenges for interpretation. Furthermore, the need for rigorous peer review is greater when the information contains precedent-setting methods or models, presents conclusions that are likely to change prevailing practices, or is likely to affect policy decisions that have a significant impact."

Then, on page 14, the first paragraph under the heading, Timing of Peer Review:

"As a general rule, it is most useful to consult with peers early in the process of producing information. For example, in the context of risk assessments, it is valuable to have the choice of input data and the specification of the model reviewed by peers before the agency invests time and resources in implementing the model and interpreting the results. 'Early' peer review occurs in time to 'focus attention on data inadequacies in time for corrections.'"

The above seems to point out that peer review in the MLPA Initiative comes too late in the process for the Master Plan Framework. I am also particularly concerned the science team subgroup slated to design the project alternative networks will not be subject to review in a timely manner.

Thanks for your time,

Rich Holland
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